

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT: NEW YORK

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TED DOUKAS, SYNGEN DATA SERVICES, TED  
DOUKAS, AS A SHAREHOLDER OF SYNGEN  
DATA SERVICES, TED DOUKAS, AS A JOINT  
VENTURE PARTNER WITH CLAUDIO BALLARD,  
TED DOUKAS, AS AN EQUITABLE OWNER OF ALL  
PATENTS AND TECHNOLOGY OWNED BY  
CLAUDIO BALLARD, TED DOUKAS, AS AN  
EQUITABLE OWNER OF ALL PATENTS AND  
TECHNOLOGY OWNED BY DATATREASURY  
CORP., TED DOUKAS, AS OWNER OF CERTAIN  
TECHNOLOGY AND ASSETS PRODUCED BY A  
JOINT VENTURE WITH CLAUDIO BALLARD, TED  
DOUKAS AS A 50% EQUITABLE OWNER OF  
DATATREASURY CORPORATION AS AN ASSIGNEE  
OF CLAUDIO BALLARD'S OWNERSHIP OF A  
CERTAIN PATENT DEVELOPED BY THE JOINT  
VENTURE AND UNKNOWN DEFENDANTS NAMED  
JOHN AND JANE DOES "1" THROUGH "750",

Plaintiffs,

-against-

**NOTICE OF MOTION TO  
REMAND (28 U.S.C. §§ 1447 [c] )**

Case No.: 2:11-CV-3275

Hon. Joseph F. Bianco

District Court Judge

CLAUDIO BALLARD, KEITH DELUCIA a/k/a  
"KEITH WICKEY", a/k/a "KEITH DOYLE", SHEPARD  
LANE, KNOWN BUT UNIDENTIFIED DEFENDANTS  
JOHN AND JANE DOES "1" THROUGH "750",  
DATATREASURY CORP., KEITH DELUCIA a/k/a  
"KEITH WICKEY", a/k/a "KEITH DOYLE", AS AN  
OWNER OF SHARES IN DTC, SHEPARD LANE, AS  
AN OWNER OF SHARES IN DTC, CLAUDIO  
BALLARD, AS AN OWNER OF SHARES IN DTC,  
SYNGEN, INC., CLAUDIO BALLARD AS AN OWNER  
OF SHARES IN SYNGEN, CORP., CLAUDIO BALLARD  
AS THE FIDUCIARY OF TED DOUKAS AND SYNGEN  
DATA SERVICES, INC., CLAUDIO BALLARD AS THE  
CONSTRUCTIVE TRUSTEE OF TED DOUKAS'  
INTEREST IN THE TECHNOLOGY CREATED BY A  
JOINT VENTURE,

Defendants.

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**NOTICE OF MOTION TO REMAND**

**PLEASE TAKE NOTICE** that upon the pleadings and proceedings heretofore had herein, and upon the annexed Motion to Remand to state court with Exhibits and accompanying Memorandum in Support thereof, undersigned counsel for the Plaintiffs will move this Court, the United States District Court held in and for the Eastern District of New York, the Honorable Joseph F. Bianco of this Court presiding, to be held at the Courthouse located at 100 Federal Plaza, Central Islip, New York 11722, for an Order remanding this action to Supreme Court of the State of New York, Suffolk County, in which it was commenced, and for such other and further relief as to the Court may seem just and proper.

Dated: July 29, 2011  
Smithtown, New York

Respectfully Submitted,  
Robert Del Col

/s/

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**ROBERT J. DEL COL, ESQ.**  
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